JAFFE EXHIBIT 82

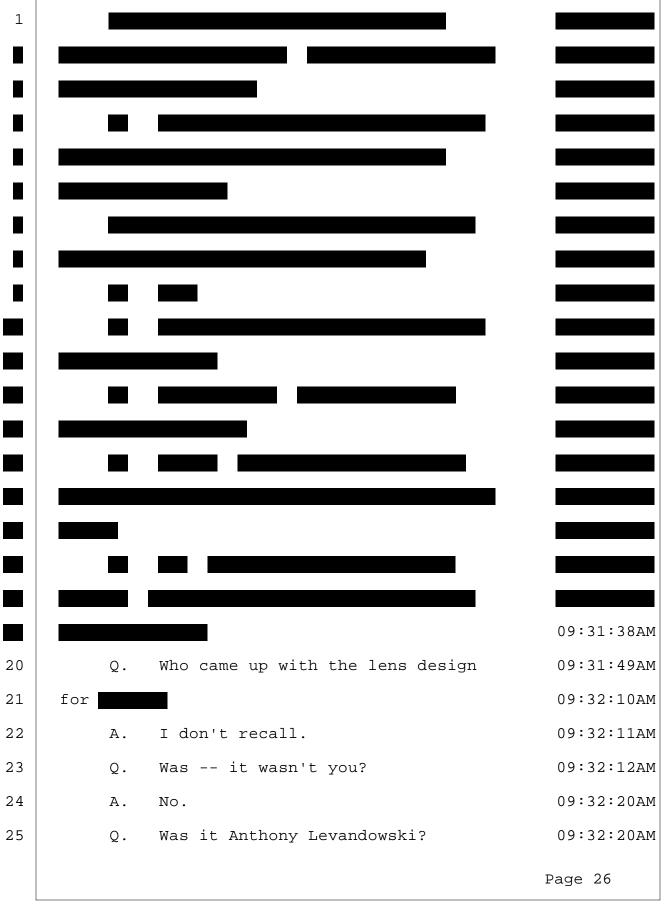
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1
                       UNITED STATES DISTRICT COURT
 2
                      NORTHERN DISTRICT OF CALIFORNIA
 3
                          SAN FRANCISCO DIVISION
 4
                                   -000-
 5
                                    )
     WAYMO LLC,
 6
 7
                   Plaintiff ,
 8
                                    )
 9
                                    )
                                      Case No: 3:17-cv-00939-WHA
        vs.
10
     UBER TECHNOLOGIES, INC.,
     OTTOMOTTO LLC, OTTO TRUCKING,)
11
     LLC,
                                    )
                   Defendants.
12
13
14
                    CONFIDENTIAL - ATTORNEYS' EYES ONLY
15
                  VIDEOTAPED DEPOSITION OF DANIEL GRUVER
16
                         San Francisco, California
17
                          Thursday, April 20, 2017
18
19
20
     Reported by:
21
     LISA R. TOW
22
     CSR No. 6629
23
     Job No. 2599857
24
25
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                                                          Page 1
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1	A. He was interested in the	09:27:19AM
2	functionality of it in respect to how it	09:27:20AM
3	pertained to the self-driving vehicle.	09:27:25AM
4	Q. Did Anthony Levandowski have input	09:27:29AM
5	into the functionality of	09:27:33AM
6	A. Yes.	09:27:35AM
7	Q. What other input would Anthony	09:27:35AM
8	Levandowski have had in relation to the	09:27:46AM
9	functionality I'm sorry. Let me start	09:27:48AM
10	over again.	09:27:50AM
11	What input did Anthony Levandowski have	09:27:50AM
12	in relation to the design of	09:27:54AM
13	A. Design review involvement, I	09:27:57AM
14	guess.	09:28:11AM
15	Q. And Anthony Levandowski would	09:28:16AM
16	provide feedback on design; is that fair?	09:28:22AM
17	A. Yeah, as it pertained to schedule	09:28:25AM
18	mostly.	09:28:29AM
19	You know, is given two options or three	09:28:30AM
20	options we would be considering would	09:28:33AM
21	something more expediently get us a system	09:28:33AM
22	to test on a truck or more thoroughly meet	09:28:36AM
23	sort of requirements our software engineers	09:28:39AM
24	wanted.	09:28:42AM
25	Q. But through that input then,	09:28:44AM
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1		
		09:37:22AM
3	Q. And that was around the	same time 09:37:22AM
4	that it was publically announced?	09:37:26AM
5	A. Yeah, I think it was exa	ctly the 09:37:28AM
6	same time.	09:37:31AM
7	Q.	
		09:38:08AM
18	Q. The going back to	. Did 09:38:13AM
19		09:38:26AM
20	A. Yes.	09:38:30AM
21	Q.	
		09:38:34AM
23	A. A combination of enginee	
24	Q. Can you name any specifi	
25	that you are aware of that were in	volved in 09:38:39AM
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A. I wouldn't say "never." 09: Q. When has he been involved? 09: Let me start over again. 09: Mr. Levan Anthony Levandowski 09: Has Anthony Levandowski been involved 09:	48:39AM 48:42AM 48:43AM 48:47AM
Q. When has he been involved? 09: Let me start over again. 09: Mr. Levan Anthony Levandowski 09: Has Anthony Levandowski been involved 09:	48:43AM
4 Let me start over again. 09: 5 Mr. Levan Anthony Levandowski 09: 6 Has Anthony Levandowski been involved 09:	
5 Mr. Levan Anthony Levandowski 09: 6 Has Anthony Levandowski been involved 09:	48:47AM
6 Has Anthony Levandowski been involved 09:	
	48:49AM
7 in any design reviews for Fuji? 09:	48:54AM
	49:05AM
8 A. I can't recall a date, but he's 09:	49:09AM
9 been involved. 09:	49:20AM
Q. Can you how many design reviews 09:	49:22AM
of Fuji have there been? 09:	49:32AM
12 A. So we we meet frequently about 09:	49:35AM
the progress of it with either engineering 09:	49:42AM
14 leads or our entire team. So, I would say 09:	49:45AM
we meet twice a week to do status updates or 09:	49:47AM
16 project updates. So, lots. 09:	49:51AM
Q. And you can't recall specific 09:	49:54AM
dates, but Anthony Levandowski has been 09:	49:57AM
involved in at least some of those design 09:	49:59AM
20 reviews; is that fair? 09:	50:02AM
A. Yeah. He's been there's been 09:	50:03AM
22 updates to him and other people about 09:	50:08AM
progress. I don't think we've setup formal 09:	50:10AM
design reviews that have involved him sort 09:	50:14AM
of being involved in a design review, but I 09:	50:16AM
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1	lawsuit	in which Mr. Levandowski may have	10:33:03AM
2	briefly	addressed the allegations?	10:33:06AM
3	Α.	I was present at the meeting.	10:33:09AM
4	Q.	What did Mr. Levandowski say?	10:33:11AM
5	Α.	I don't recall.	10:33:12AM
6	Q.		
			10:33:55AM
24	Q.	So safe to say you don't really	10:33:56AM
25	have a g	good memory of what he said at that	10:33:58AM
			Page 60
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1	have happened, but I	10:50:17AM
2	Q. What was Anthony Levandowski's	10:50:20AM
3	role in the decision to pivot from Spider to	10:50:23AM
4	Fuji?	10:50:27AM
5	A. He had the opportunity to veto a	10:50:28AM
6	design change. But didn't. So, I guess	10:50:34AM
7	Q. But ultimately the decision as to	10:50:42AM
8	whether to pivot from Spider to Fuji would	10:50:44AM
9	have been up to Anthony Levandowski; fair?	10:50:49AM
10	A. Yes.	10:50:55AM
11	Q. Fair.	10:50:55AM
12	And was Spider designed to rotate about	10:50:58AM
13	in access?	10:51:05AM
14	A. Yes.	10:51:06AM
15	Q. Did the outgoing laser beams go	10:51:06AM
16	through a hole in a mirrored surface in	10:51:10AM
17	Spider?	10:51:13AM
18	A. Yes.	10:51:13AM
19	Q. Did the incoming reflected light	10:51:15AM
20	bounce off that mirrored surface on it's way	10:51:19AM
21	to the received block in Spider?	10:51:23AM
22	A. Yes.	10:51:24AM
23	Q. Would light transmit out and	10:51:29AM
24	return through the same lens pair in Spider?	10:51:32AM
25	A. So, we prototyped a handful of	10:51:36AM
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1	discussed a handful of designs. I'm trying	10:51:48AM
2	to remember which one was the last plan of	10:51:51AM
3	record. But, I believe the sort of last	10:51:53AM
4	plan of record had that.	10:51:56AM
5	Q. And did Spider use more than one	10:51:58AM
6	laser?	10:52:01AM
7	A. Clarify.	10:52:06AM
8	Q. Did Spider have available to it	10:52:07AM
9	the use of more than one laser?	10:52:12AM
10	A. Yes.	10:52:14AM
11	Q. And did the received block in	10:52:14AM
12	Spider use more than one receiver?	10:52:18AM
13	A. Yes.	10:52:21AM
14	Q. Did the light going out let me	10:52:22AM
15	start over again.	10:52:26AM
16	When the light went out in Spider would	10:52:28AM
17	it partially overlap with the path of light	10:52:34AM
18	returning to the received block?	10:52:39AM
19	A. Yes.	10:52:41AM
20	Q. And was were the lenses in	10:52:55AM
21	Spider were they in a housing of some kind?	10:53:09AM
22	A. Yes.	10:53:12AM
23	Q. Why don't we go off the record.	10:53:12AM
24	THE VIDEOGRAPHER: Off the record at	10:53:19AM
25	10:50 a.m.	10:53:24AM
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